



Simple Organic Solutions, LLC

1873 Bullevar  
Philomath, OR 97370

541-740-6490  
Fax 801-991-5660

[www.SimpleOrganicSolutions.com](http://www.SimpleOrganicSolutions.com)

August 11, 2005

Arthur Neal  
Director, Program Administration  
National Organic Program  
USDA-AMS-TMO-NOP  
1400 Independence Ave. SW  
Room 4008 So. Bldg.  
Ag Stop 0268  
Washington, DC 20250  
e-mail: [National.List@USDA.gov](mailto:National.List@USDA.gov)  
FAX: 202-205-7808

Dear Mr. Neal and the National Organic Standards Board:

This letter is in reference to the National Organic Program, Sunset Review, Docket number TM-04-07. Many of my clients are either currently producing certified organic products or are preparing to enter the marketplace with certified organic products. As I assist them in product formulation, there is need of most, if not all of the currently listed items in §205.605 and §205.606. I would hate to see any items dropped from the list. I have included specific reference to a number of items that are considered critical to my clients.

Citric acid §205.605(a)(1)(ii) Needed to acidify products. It is necessary to reduce the pH to a level that prevents botulism growth and thus insure food safety. This is a critical compound and must not be dropped from listing or food safety would be unacceptably compromised. The current annotation is appropriate.

Gums §205.606(b) Needed for texture. This is an agricultural product that is currently not available in organic form. Should it eventually become available as a certified organic product, I would recommend that my clients use that form.

Bentonite §205.605(a)(2). Processing aid that is necessary for clarifying a variety of liquid products. It is used to help remove undesirable material. It is listed as GRAS by FDA under 21 CFR 184.1155 where it states that "Current good manufacturing practice results in no significant residue in foods". It is a natural mined mineral and as noted leaves no residue in the food.

Diatomaceous Earth §205.605(a)(7). Processing aid that is necessary for clarifying a variety of liquid products. It is used to help remove undesirable material. The current annotation is appropriate.

Carbon dioxide §205.605(b)(8) Carbon dioxide is used as a solvent in the supercritical extraction of flavoring compounds. These flavor compounds are critical to the formulation and consumer acceptance of a variety of foods. It is also used in the carbonation of beverages where it performs a critical function. Flat beer is just not good.

Chlorine materials §205.605(b)(9) Used as contact surface sanitizers. The safety of the organic food

supply would be compromised by the removal of these important sanitizers from the National List.

Nutrient Vitamins and Minerals §205.605(b)(19) The fortification of foods that are targeted for specific populations is important for the general health and well being of consumers. These items should remain on the National List. The current annotation is appropriate.

Flavors §205.605(a)(9) Flavors are an important ingredient when formulating a product so that it has consumer appeal. The current annotation is appropriate.

Colors §205.605(a)(5) Colors are an important ingredient when formulating a product so that it has consumer appeal. The current annotation is appropriate.

Sincerely,

A handwritten signature in dark ink, appearing to read "Robert W. Durst". The signature is fluid and cursive, with a long horizontal stroke at the end.

Bob Durst  
Processing and Materials Director  
Simple Organic Solutions, LLC